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**PERMIT TO OPERATE EVALUATION**

**COMPANY NAME, LOCATION ADDRESS:**

Ultramar Inc, SCAQMD ID # 800026  
 2402 E. Anaheim Street  
 Wilmington, CA 90744


**EQUIPMENT DESCRIPTION:**

Additions to the equipment description are underlined. Deletions to the equipment description and conditions are noted in strikeouts.


**Section D of Ultramar's Facility Permit, ID# 800026**

**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS**


Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
<b>Process 13: OIL/WATER SEPARATION</b>					
<b>System 1: WASTE WATER TREATMENT SYSTEM</b>					S4.3, S13.7, S15.5, S15.12
SUMP, 95-SMP-1, DIVERSION BOX, <u>VENTED TO VAPOR RECOVERY SYSTEM WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM</u> , WIDTH: 21 FT 6 IN; DEPTH: 12 FT; HEIGHT: 34 FT  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D201	D1235 D1236 <u>D1239</u>		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  <b>VOC:</b> 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.25
STORAGE TANK, 83-TK-6, CAUSTIC, 500 GALS; DIAMETER: 4 FT; HEIGHT: 5 FT 6 IN  A/N: 331525	D206		Removed from service in PC		
TANK, FIXED ROOF, SKIM, 95-TK-905, 7000 GALS; DIAMETER: 10 FT; HEIGHT: 11 FT  A/N: 331525	D207		Removed from service in PC	[VOC]: 500 PPMV (8) 40CFR 61 Subpart FF, 12-4-2003	
SUMP, 95-SMP-5, EFFLUENT WATER, FIXED COVER, 6730 GALS; WIDTH: 10 FT; DEPTH: 9 FT; LENGTH: 10 FT  A/N: 331525	D208		Removed from service in PC	[VOC]: 500 PPMV (8) 40CFR 61 Subpart FF, 12-4-2003	
SUMP, 95-SMP-2, TREATED EFFLUENT SUMP (TES), EFFLUENT WATER, FIXED COVER, 28,426 GALS; WIDTH: 14 FT; DEPTH: 10 FT; LENGTH: 20 FT  A/N: 458073	D1618			<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>HAP:</b> (10) [40CFR 63 Subpart CC, #2, 5-25-2001 10-28-2009];	

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Permit to Construct Issued: 06/21/07				VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
WASTE WATER SEPARATOR, PARALLEL PLATE INTERCEPTOR, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM 95-ME-9001A, FIXED COVER  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D209	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  HAP: (10) [40CFR 63 Subpart CC, #2, 5-25-2001 10-28-2009];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
WASTE WATER SEPARATOR, PARALLEL PLATE INTERCEPTOR, 95-ME-9002 A  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D210		Removed from service	BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  HAP: (10) [40CFR 63 Subpart CC, #2, 5-25-2001];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	
CENTRIFUGE, 95-ME-9003 A, HORIZONTAL DECANTER, 200 GPM  A/N: 331525	D211		Removed from service in PC		
HOPPER, 95-ME-9004, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM, SLUDGE  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D212	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	
TANK, CENTRIFUGE FEED, 95-TK-9019, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM, 2000 BBL.; DIAMETER: 25 FT; HEIGHT: 24 FT  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D213	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.25
WASTE WATER SEPARATOR, PARALLEL PLATE INTERCEPTOR, 95-ME-9001B, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM, FIXED COVER  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D214	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  HAP: (10) [40CFR 63 Subpart CC, #2, 10-28-2009];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
				VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
WASTE-WATER-SEPARATOR; PARALLEL PLATE INTERCEPTOR, 95- ME-9002B  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D215		<i>Removed from service but not demolished</i>	<del>BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];</del>  <del>HAP: (10) [40CFR 63 Subpart CC, #2, 5-25-2001];</del>  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]	
CENTRIFUGE, 95-ME-9003B; HORIZONTAL DECANTER, 200 GPM  A/N: 331525	D216	D1235	<i>Removed from service in PC</i>		
TANK, DESANDER, 95-TK-9021A, FIXED ROOF, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM, HEIGHT: 11 FT; DIAMETER: 6 FT  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D881	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
TANK, DESANDER, 95-TK-9021B, FIXED ROOF, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM HEIGHT: 11 FT; DIAMETER: 6 FT  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D882	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
SUMP, 83-SMP-3, CRUDE TANK DRAW- OFF, FIXED COVER, 13800 GALS; WIDTH: 10 FT; DEPTH: 9 FT; LENGTH: 10 FT  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D999			BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  HAP: (10) [40CFR 63 Subpart CC, #2, 5-25-2001 10-28-2009];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
TANK, 95-TK-9018, PPI SLUDGE BLOWDOWN, FIXED ROOF, VENTED TO VAPOR RECOVERY SYSTEM, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM 240 BBL; DIAMETER: 12 FT; HEIGHT: 12 FT  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D1000	D1235 D1236 D1239		BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]  VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	
CONVEYOR, SCREW, SLUDGE AUGUR, 2HP	D1001		<i>Removed from service</i>		

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
A/N: 331525 458073  Permit to Construct Issued: 06/21/07					
MIXER, 95-ME-9004MX, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM SLUDGE  A/N: 331525 458073  Permit to Construct Issued: 06/21/07	D1002	D1235 D1236 D1239			
WASTE WATER SEPARATOR, 95-V- 9004, INDUCED GAS FLOTATION UNIT(IGF), 1000GPM CAPACITY, FUEL GAS BLANKETED, LENGTH: 29 FT; DIAMETER: 6 FT 6 IN  A/N: 323862 Permit to Construct Issued: 05/01/97	D1133		Removed from service	<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]	
WASTE WATER SEPARATOR, 95-V- 9003, INDUCED GAS FLOTATION UNIT(IGF), 1000 GPM CAPACITY, FUEL GAS NITROGEN BLANKETED, LENGTH: 29 FT; DIAMETER: 6 FT 6 IN  A/N: 323862 Permit to Construct Issued: 05/01/97	D1003	D1235 D1236 D1239		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]  <b>VOC:</b> 500 PPMV (5) [RULE 1176, 9-13-1996]	
WASTE WATER SEPARATOR, AIR FLOTATION UNIT(AFU), ME-900, FIXED COVER, SPARE, HEIGHT: 10 FT 1 IN; DIAMETER: 14 FT  A/N: 323862 Permit to Construct Issued: 05/01/97	D1006		Removed from service	<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>HAP:</b> (10) [40CFR 63 Subpart CC, #2, 5-25-2001];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]	H23.15
WASTE WATER SEPARATOR, AIR FLOTATION UNIT(AFU), 95-ME-9000, SPARE, HEIGHT: 12 FT 5 IN; DIAMETER: 19 FT 6.375 IN  A/N: 323862 Permit to Construct Issued: 05/01/97	D1007		Removed from service in PC		H23.15
WASTE WATER SEPARATOR, API, 95- ME-9008, FIXED COVER, WITH FUEL NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM, 1440000 GALS/DAY; WIDTH: 10 FT; HEIGHT: 7 FT 1 IN; LENGTH: 79 FT  A/N: 323862 Permit to Construct Issued: 05/01/97	D1224	D1235 D1236 D1239		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>HAP:</b> (10) [40CFR 63 Subpart CC, #2, 55-25-2001 10-28-2009];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12- 4-2003]  <b>VOC:</b> 500 PPMV (5)	E57.1, H116.1


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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
				[RULE 1176, 9-13-1996]	
TANK, 95-TK-9028, FIXED ROOF, DRY OIL, WITH <u>NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM</u> , HEIGHT: 5 FT; DIAMETER: 3 FT  A/N: 323862 Permit to Construct Issued: 05/01/97	D1225	<u>D1235</u> <u>D1236</u> <u>D1239</u>		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003] <b>VOC:</b> 500 PPMV (5) [RULE 1176, 9-13-1996]	E57.1
TANK, 95-TK-9029, FIXED ROOF, SCUM, WITH <u>NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM</u> , HEIGHT: 7 FT; DIAMETER: 3 FT 6 IN  A/N: 323862 Permit to Construct Issued: 05/01/97	D1226	<u>D1235</u> <u>D1236</u> <u>D1239</u>		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  <b>VOC:</b> 500 PPMV (5) [RULE 1176, 9-13-1996]	E57.1
TANK, 95-TK-9030, FIXED ROOF, <u>SULFURIC ACID, NITROGEN BALNKETED, RECOVERED WATER</u> , HEIGHT: 7 FT; DIAMETER: 6 FT  A/N: 323862 Permit to Construct Issued: 05/01/97	D1227	<u>D1235</u> <u>D1236</u>		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]	E57.1
<del>KNOCK OUT POT, 95-V-9004, VENTED TO VAPOR RECOVERY SYSTEM, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM</del> , HEIGHT: 5 FT; DIAMETER: 1 FT 6 IN  A/N: 331525 458073 Permit to Construct Issued: 06/21/07	D1234	<u>D1235</u> <u>D1236</u> <u>D1239</u>			
TANK, 95-TK-9020, <del>OIL DRAIN, WATER, FIXED ROOF, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM</del> , HEIGHT: 5 FT; DIAMETER: 3 FT  A/N: 331525 458073 Permit to Construct Issued: 06/21/07	D1240	<u>D1235</u> <u>D1236</u> <u>D1239</u>		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  <b>VOC:</b> 500 PPMV (5) [RULE 1176, 9-13-1996]	H23.15
TANK, 95-TK-9022, OIL DRAIN, FIXED ROOF, <del>VENTED TO VAPOR RECOVERY SYSTEM, WITH NATURAL GAS BLANKET AND CLOSED VENT SYSTEM VENTED TO VAPOR RECOVERY SYSTEM</del> , HEIGHT: 5 FT; DIAMETER: 3 FT  A/N: 331525 458073	D1241	<u>D1235</u> <u>D1236</u> <u>D1239</u>		<b>BENZENE:</b> (10) [40CFR 61 Subpart FF, #1, 12-4-2003];  <b>VOC:</b> 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]  <b>VOC:</b> 500 PPMV (5) [RULE 1176, 9-13-1996]	


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Permit to Construct Issued: 06/21/07					
SUMP, 83-SMP-02, OILY WATER, FIXED COVER  A/N: 458073	DNEW			<b>BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];</b>  <b>HAP: (10) [40CFR 63 Subpart CC, #2, 10-28-2009];</b>  <b>VOC: 500 PPMV (8) [40CFR 61 Subpart FF, 12-4-2003]</b>  <b>VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]</b>	
FUGITIVE EMISSIONS, MISCELLANEOUS  A/N: 334525 458073 Permit to Construct Issued: 06/21/07	D1353			[HAP]: (10) [40CFR 63 Subpart CC, #5A, 5-25-2001 10-28-2009 ]	H23.17
DRAIN SYSTEM COMPONENT  A/N: 334525 458073 Permit to Construct Issued: 06/21/07	D1405			<b>BENZENE: (10) [40CFR 61 Subpart FF, #1, 12-4-2003];</b>  <b>[HAP]: (10) 40CFR 63 Subpart CC, #2, 5-25-2001 10-28-2009]</b>	H23.25

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
<b>Process 17: AIR POLLUTION CONTROL</b>					
<b>System 11: VAPOR RECOVERY SYSTEM SERVING WASTEWATER SYSTEM</b>					<u>S15.5</u> , <u>S15.12</u> , S18.1
POT, 95-V-9001, VAPOR RECOVERY DRAIN; HEIGHT: 4 FT; DIAMETER: 2 FT  A/N: 334526 487822	D201				

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
EJECTOR, 95-EJ-1A, STEAM, SIZE: 3"  A/N: 334526 487822	D1235	D4 D201 D209 D212 D213 D214 D246 D404 D881 D882 D1000 D1002 D1003 D1224 D1225 D1226 D1227 D1234 D1240 D1241 D1239			
EJECTOR, 95-EJ-1B, STEAM, SIZE: 3"  A/N: 334526 487822	D1236	D4 D201 D209 D212 D213 D214 D219 D220 D221 D252 D404 D881 D882 D1000 D1002 D1003 D1224 D1225 D1226 D1227 D1234 D1240 D1241 D1239			
POT, 95-V-9002, VAPOR RECOVERY DRAIN; HEIGHT: 5 FT; DIAMETER: 2 FT  A/N: 334526 487822	D1238				
EJECTOR, 89-EJ-1, STEAM, SIZE: 3"  A/N: 334526 487822	D1239	D4 D201 D209 D212 D213 D214 D222 D223 D224 D404 D881 D882 D1000 D1002 D1003 D1224 D1225 D1226 D1234 D1240 D1241 D1235 D1236			
FUGITIVE EMISSIONS, MISCELLANEOUS  A/N: 334526 487822	D1366			<b>HAP: (10) [40CFR 63 Subpart CC, #5A, 5-25-2001-10-28-2009]</b>	H23.17

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#### SYSTEM CONDITIONS:

S4.3 The following condition(s) shall apply to all affected devices listed under Sections D and H of this system for fugitive emissions of volatile organic compounds (VOC):

All components are subject to District Rule 1173.

All new components in VOC service as defined in Rule 1173, except valves and flanges shall be inspected quarterly using EPA reference method 21. All new valves and flanges in VOC service except those specifically exempted by Rule 1173 shall be inspected monthly using EPA Method 21.

All new components in VOC service, a leak greater than 500 ppm but less than 1,000 ppm measured as methane above background as measured using EPA Method 21, shall be repaired within 14 days of detection. Components shall be defined as any valve, fitting, pump, compressor, pressure relief device, diaphragm, hatch, sight-glass, and meter, which are not exempted by Rule 1173.

All new valves greater than 2-inch size and major components in VOC service as defined by Rule 1173, except those specifically exempted by Rule 1173 shall be distinctly identified from other components through their tag numbers (e.g. numbers ending in the letter "N"), and shall be noted in the records

All new valves in VOC service except those specifically exempted by Rule 1173, shall be bellow-sealed valves for 2-inch and smaller sizes, except in the following applications: heavy liquid service, control valve, instrument piping/tubing, applications requiring torsional valve stem motion, applications where valve failure could pose safety hazard (e.g. drain valves with valve stems in horizontal position), and retrofits with space limitations.

If 98.0 percent or greater of the new valve and the new flange population inspected is found to leak gaseous or liquid volatile organic compounds at a rate less than 500 ppm for two consecutive months, then the operator shall revert to a quarterly inspection program with the approval of the executive officer.

The operator shall keep records of the monthly inspection (and quarterly where applicable), subsequent repair, and reinspection, in a manner approved by the District.

~~The operator shall provide to the District, no later than 60 days after initial startup, a plot plan or process instrumentation diagrams with a listing showing by functional grouping, location, type, accessibility, and application of each new valve in VOC service.~~

[**RULE 1173, 5-13-1994**; RULE 1173, 6-1-2007; **RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002]

[Systems subject to this condition: Process 8, System 3; Process 10, System 2; Process 13, System 1]


S13.7 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1176
VOC	40CFR60, SUBPART	QQQ
Benzene	40CFR61, SUBPART	FF

[**RULE 1176, 9-13-1996**; **40CFR 60 Subpart QQQ, 10-17-2000**; **40CFR 61 Subpart FF, 12-4-2003**]

[Systems subject to this condition: Process 13, System 1]



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S15.5 The vent gases from all affected devices of this process/system shall be vented as follows:

All vent gases under normal operating conditions shall be directed to the vapor recovery system(s).

This process/system shall not be operated unless the vapor recovery system(s) is in full use and has a valid permit to receive vent gases from this system.

**[RULE 1303(a)(1)-BACT, 05-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 05-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

[Systems subject to this condition : Process 1, System 5; Process 2, System 1 , 3 , 5; Process 3, System 1; Process 4, System 1 , 3 , 5 , 7; Process 5, System 1; Process 7, System 1 , 3; Process 8, System 1 , 2 , 3 , 4 , 5; Process 10, System 1 , 2 , 3 , 4 , 5 , 6 , 7 , 8 , 11 , 12; Process 13, System 1; Process 17, System 11, 50 , 97]

S15.12 The vent gases from all affected devices of this process/system shall be vented as follows:

All emergency vent gases shall be directed to a blowdown vapor recovery system and/or blowdown flare system.

When the emergency vent gases are being directed to the blowdown vapor recovery system, this process/system shall not be operated unless the blowdown vapor recovery system is in full use and has a valid permit to receive vent gases from this system.

When the emergency vent gases are being directed to the blowdown flare system, this process/system shall not be operated unless the blowdown flare system is in full use and has a valid permit to receive vent gases from this system.

**[RULE 1303(a)(1)-BACT, 05-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 05-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

[Systems subject to this condition : Process 1, System 1 , 3 , 5; Process 2, System 1 , 3 , 5; Process 3, System 1; Process 4, System 1 , 3 , 5 , 7; Process 5, System 1; Process 7, System 1 , 3; Process 8, System 1 , 2 , 3 , 4; Process 10, System 1 , 2 , 3 , 4 , 5 , 6 , 7 , 8 , 10 , 11 , 12 , 13; Process 13, System 1; Process 14, System 5 , 6; Process 17, System 11, 46 , 50 , 88 , 97]


S18.1 All affected devices listed under this process/system shall be used only to receive, recover and/or dispose of vent gases routed from the system(s) or process(es) listed below, in addition to specific devices identified in the "connected to" column:

Wastewater Treatment System (Process: 13, System: 1)

**[RULE 1303(a)(1)-BACT, 05-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 05-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**

[Systems subject to this condition: Process 17, System 11]

#### DEVICE CONDITIONS:

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## E. Equipment Operation/Construction Requirements

~~E57.1 The operator shall vent this equipment to a vapor recovery system which is in full operation and has been issued a permit to operate by the district whenever this equipment is in operation.~~

~~[RULE 1303(a)(1) BACT, 05-10-1996; RULE 1303(a)(1) BACT, 12-6-2002; RULE 1303(b)(2) Offset, 05-10-1996; RULE 1303(b)(2) Offset, 12-6-2002]~~

~~[Devices subject to this condition: D1224, D1225, D1226, D1227]~~

*Note: This condition is being removed since the equipment description describes the equipment is vented to vapor recovery and is connected to the vapor recovery system.*

## H. Applicable Rules

H23.17 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173

**[RULE 1173, 2-6-2009]**

[Devices subject to this condition: D872, D1310, D1312, D1314, D1317, D1318, D1319, D1321, D1323, D1325, D1331, D1333, D1334, D1336, D1337, D1338, D1339, D1340, D1341, D1343, D1344, D1345, D1346, D1347, D1352, D1353, D1354, D1355, D1357, D1358, D1365, D1366, D1367, D1368, D1369, D1370, D1418, D1442, D1623, D1624, D1625, D1626]

H23.25 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Benzene	40CFR61, SUBPART	FF

**[40CFR 61 SUBPART FF, 12-4-2003]**

[Devices subject to this condition: D199, D201, D219, D220, D222, D223, D224, D252, D276, D307, D309, D1405]


H116.1 The operator shall install and maintain a flow indicator at the vent stream to the vapor recovery system in order to comply with 40CFR60 Subpart QQQ Section 60.692-5 whenever this equipment is in operation.

**[40CFR 60 Subpart QQQ, 10-10-2000]**

[Devices subject to this condition: D1224]

## REVIEW OF COMPLIANCE DATABASE:

Since January 1, 2011, Ultramar has received sixteen (16) Notices to Comply and Notices of Violation. NOV # P61007 was issued on March 20, 2013 for the wastewater system since some of the drain component

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systems were found to exceed 500 ppmv above background levels. This NOV has since been resolved and the wastewater system is currently in compliance.

Due to Ultramar's personnel difficulties and SCAQMD's internal June 2013 deadline to issue permits to aged applications, Ultramar was not able to provide information for the engineer's additional request by the given deadline. At this time, the District will convert the PC to PO with the provided information in the PC application. Because there are no outstanding NOV's for the subject equipment, the facility is deemed to be in compliance with their permit.

### **BACKGROUND:**


Ultramar operates a refinery in the city of Wilmington. The facility is a NO<sub>x</sub> and SO<sub>x</sub> RECLAIM facility. The Title V permit was issued and effective on May 29, 2009.

During the review of the refinery's draft initial Title V permit in 2008, Ultramar discovered an inconsistency in the equipment currently described in the Facility Permit for the Wastewater Treatment System (Process 13, System 1) and the Vapor Recovery System Serving the Wastewater System (Process 17, System 11). Many devices in the Wastewater Treatment System either no longer exist or were never installed. In addition, the connections from the Wastewater Treatment System to the Vapor Recovery System were not properly described on the permit. As a result, Ultramar submitted an application (**A/N 487822**) to modify the equipment description and connections in the Facility Permit.

In 1997 Ultramar submitted **A/N 323862** to install a new API separator in the wastewater system. In 2006 Ultramar had submitted **A/N 458073** to modify the wastewater treatment system to remove, relocate, and/or reconfigure equipment located in the location of the new FCCU electrostatic precipitator (ESP) to be constructed due to Rule 1105.1 (a.k.a., Rule 1105.1 Compliance Project). In this project, Ultramar needed to remove an existing sump to make room for the new ESP and installed a new sump to replace the old sump. Both Permits to Construct for A/Ns 458073 and 323862 have been issued. Please see the PC evaluation for details.

Before A/N 323862 was submitted, the refinery's wastewater system consists of Parallel Plate Interceptors (PPIs) and Air Flotation Unit (AFU). With A/N 323862, the refinery proposed to install an API separator to be operated with the Induced Gas Flotation (IGF) separators. Engineer Norman Ng determined at the time the API separator and IGF separator could operate independently of the existing wastewater system. As a result, A/N 323862 was permitted as a separate wastewater system from the refinery's existing wastewater system. The refinery has since removed the AFU from the wastewater system and collectively operates the API separator, PPIs, and IGF separator as the wastewater system. Therefore, the entire wastewater system consisting of API separator, PPIs, and IGF separator will be considered as one permit unit instead of two units and A/N 323862 will be merged into A/N 458073.

Application No.	487822	458073	323862
Equipment Description	Vapor Recovery System Serving Wastewater System	Wastewater Treatment System	Wastewater Treatment System
Application Description	Update the connections to the vapor recovery	Rule 1105.1 Compliance Project: Remove, relocate, and/or reconfigure equipment located in the	Install new API separator system


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Application No.	487822	458073	323862
	system	location of the new FCCU electrostatic precipitator (ESP) constructed to comply with Rule 1105.1	
Date Received	October 15, 2008	June 20, 2006	January 28, 1997
Date Deemed Complete	January 13, 2009	October 4, 2006	--
Application Type	50	50	50
Application Status	21	26	26
BCAT	--	294957	294957
CCAT	59	--	--
Fee Schedule	E	E	E
Fee Submitted	\$5,148.93 + \$2,574.46 <sup>a</sup> = \$7,723.40	\$3,868.47	\$3,3320.50
Fee Required	\$5,148.93 + \$2,574.46 <sup>a</sup> = \$7,723.40	\$3,868.47	\$3,3320.50
PC Issuance Date	n/a	6/21/2007	5/1/1997
Previous Application No.	331526, Permit # F1006 (Active)	331525(PC cancelled) 298029 (PC cancelled) 176872, Permit #D37998 (Active)	307082 (PC cancelled)
Date Last P/O Issued	10/22/1997	5/21/1991	5/21/1991
Facility Permit Amendment A/N	485027	n/a	n/a
Facility Permit Devices	Various devices in Process 17, System 11	Various devices in Process 13, System 1	Various devices in Process 13, System 1

<sup>a</sup> The facility initially submitted the application with an expedited fee. However, this was not deemed necessary and the additional fee was used for the 50% penalty of constructing without permit.


## **PERMIT HISTORY**

The permit history for each unit is as follows:

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**Table 2. Permit History**

Permit Unit	Application #	Application Status	Application Type	Permit #	Comment
Wastewater Treatment System	458073	26	50	n/a	PC issued 6/21/2007 2006: Application submitted to remove and relocate some of the wastewater equipment located at the proposed site of the new FCCU ESP due to Rule 1105.1 (a.k.a, Rule 1105.1 Compliance Project)
	331525	52	50	n/a	PC Issued 10/22/1997 PC Cancelled 7/19/2007 1997: Application submitted to vent the VOC from the diversion box of the wastewater system to a new vapor recovery system to comply with Rule 1176
	298029	51	20	n/a	PC issued in 1994 PC Cancelled 1994: Application submitted to replace existing Air Flotation Unit (AFU) with an Induced Gas Flotation (IGF) unit. Existing AFU would be retained as a standby unit.
	176872	31	20	D37998 Active	PC issued 8/15/1989 PO issued 5/2/1991 1988: Change of ownership to Ultramar and also to modify slop oil and separation system
	155571	51	50	n/a	PC issued in 1987; PC Cancelled due to C/O 1987: Union Pacific Resources, ID. 5190 upgraded their wastewater system by demolishing the old API system and installing new parallel plate interceptor (PPI) separators.
	C41277	31	10	M43980 Inactive	1982: Application submitted by Union Pacific Resources, ID. 5190
	A82609	31	0	P59729 Inactive	
Wastewater Treatment System	323862	26	50	n/a	PC issued in 1978 1997: Ultramar filed for new installation of a new API separator system.
	307082	51	20	n/a	PC issued in 1996 PC cancelled 1995: Ultramar proposed to install another Induced Gas Flotation (IGF) unit. This was part of the Phase 3 Reformulated Fuels Program mandated by CARB. This was permitted as a separate unit to the existing wastewater system.
Vapor Recovery System for Wastewater Treatment System	331526	31	10	F10006 Active	New Construction. Application submitted in 1997 to have wastewater treatment system vented to vapor recovery system to comply with Rule 1176

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## **PROCESS DESCRIPTION:**

Ultramar, Inc. operates a wastewater treatment system (Process 13, System 1) along with a vapor recovery system (Process 17, System 11) to reduce the VOC emissions. The diversion box (95-SMP-1, D201) is an underground sump that serves as a junction box within the refinery's wastewater treatment system. The diversion box receives untreated process wastewater from the refinery's drain system. The API separator (95-ME-9008, D1224) then receives the water from the diversion box. The API separator is the primary separator that separates oil and solid from the process waste water. In the API separator, floating oil is removed by a skimmer and settler solids are removed as sludge by a scraper.

Following the API separator, the waste water is then sent to the parallel plate interceptors (PPI, 95-ME-9001A/B) to further enhance the degree of oil-water separation. PPIs are similar to API separators but they include tilted parallel plate assemblies (also known as parallel packs). The underside of each parallel plate provides more surface for suspended oil droplets to coalesce into larger globules. Any sediment slides down the topside of each parallel plate. Like the API separator, the effectiveness of the PPI separator will depend upon the specific gravity between the suspended oil and the water.

Downstream of the PPI, the wastewater is sent to an Induced Gas Flotation (IGF) separator (95-V-9003, D1003) to further clarify the water before the treated water is sent to Los Angeles County Sanitation District (LACSD). In the IGF, any remaining oil or solids are removed by injecting pressurized air to form small air bubbles into the wastewater. The small bubbles adhere to the suspended matter causing the suspended matter to float to the surface of the water where it may then be removed by a skimmer. A polymer compound is injected to aid in separation. The water then exits the flotation unit as clarified effluent. The effluent water is passed from the IGF to Treated Effluent Sump (TES, 95-SMP-2, D1618), where it is mixed with clean effluent water from other sources and discharged to LACSD. Water pH is adjusted using acid or caustic as needed; hydrogen peroxide is also used to minimize bacterial growth.

In 1997, Ultramar installed a new vapor recovery system (Process 12, System 11) to vent the VOC from the wastewater system to comply with the requirements of Rule 1176. A/N 331526 was filed for the installation of this vapor recovery system which was installed without permit. Rule 1176 required the wastewater system to comply with a VOC limit of 500 ppm by July 1, 1997. The vapor recovery system consists of two steam ejectors, 95-EJ-1A/B, connected in parallel, and two associated condensate drain pots, 95-V-9001 and 95-V-9002, connected upstream and downstream of the eductors, respectively. Heavy hydrocarbons will be condensed and collected at the drain pots of the vapor recovery system and returned to the waste water system. The non-condensable gases from the vapor recovery system are then routed to the Phase I flare water seal drum, 89-V-9002.

The vapor recovery system for the wastewater system also serves other equipment within the refinery such as the sour oil storage tank 83-TK-5, dry oil tank 94-TK-909A/B, and sour water storage tank 48-TK-1. The following devices within the wastewater system are connected to the following ejectors of the vapor recovery system for the wastewater system:

Equipment	Device ID	Connected To	Vapor Recovery System	Device ID	Connected To	Flare	Device ID
Diversion Box, 95-	D201						


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Equipment	Device ID	Connected To	Vapor Recovery System	Device ID	Connected To	Flare	Device ID
SMP-1							
PPI Separator, 95-ME-9001A	D209						
Hopper, 95-ME-9004	D212						
Tank, 95-TK-9019	D213						
PPI, 95-ME-9001B	D214						
Tank, 95-TK-9021A	D881						
Tank, 95-TK-9021B	D882						
Tank, 95-TK-9018	D1000						
Mixer, 95-ME-9004MX	D1002	→	Ejector, 95-EJ-1A	D1235	→	Drum, Phase I Flare Water Seal, 89-V-9002	D404
IGF Separator, 95-V-9003	D1003						
API Separator, 95-ME-9008	D1224						
Tank, 95-TK-9028	D1225						
Tank, 95-TK-9029	D1226						
Knockout Pot, 95-V-9004	D1234						
Tank, 95-TK-9020	D1240						
Tank, 95-TK-9022	D1241						
Ejector, 89-EJ-1	D1239						
Diversion Box, 95-SMP-1	D201						
PPI Separator, 95-ME-9001A	D209						
Hopper, 95-ME-9004	D212						
Tank, 95-TK-9019	D213						
PPI, 95-ME-9001B	D214						
Tank, 95-TK-909A	D219						
Tank, 95-TK-909B	D220						
Tank, 48-TK-1	D221						
Tank, 83-TK-5	D252						
Tank, 95-TK-9021A	D881						
Tank, 95-TK-9021B	D882						
Tank, 95-TK-9018	D1000	→	Ejector, 95-EJ-1B	D1236	→	Drum, Phase I Flare Water Seal, 89-V-9002	D404
Mixer, 95-ME-9004MX	D1002						
IGF Separator, 95-V-9003	D1003						
API Separator, 95-ME-9008	D1224						
Tank, 95-TK-9028	D1225						
Tank, 95-TK-9029	D1226						
Tank, 95-TK-9030	D1227						
Knockout Pot, 95-V-9004	D1234						
Tank, 95-TK-9020	D1240						
Tank, 95-TK-9022	D1241						
Ejector, 89-EJ-1	D1239						

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Equipment	Device ID	Connected To	Vapor Recovery System	Device ID	Connected To	Flare	Device ID
Diversion Box, 95-SMP-1	D201	→	Ejector, 89-EJ-1	D1239	→	Drum, Phase I Flare Water Seal, 89-V-9002	D404
PPI Separator, 95-ME-9001A	D209						
Hopper, 95-ME-9004	D212						
Tank, 95-TK-9019	D213						
PPI, 95-ME-9001B	D214						
Tank, 95-TK-1	D222						
Tank, 95-TK-950	D223						
Tank, 95-TK-952	D224						
Tank, 95-TK-9021A	D881						
Tank, 95-TK-9021B	D882						
Tank, 95-TK-9018	D1000						
Mixer, 95-ME-9004MX	D1002						
IGF Separator, 95-V-9003	D1003						
API Separator, 95-ME-9008	D1224						
Tank, 95-TK-9028	D1225						
Tank, 95-TK-9029	D1226						
Tank, 95-TK-9020	D1240						
Tank, 95-TK-9022	D1241						
Ejector, 95-EJ-1A	D1235						
Ejector, 95-EJ-1B	D1236						

### **EMISSIONS:**

Uncontrolled VOC emissions from the oil-water separator and its auxiliary equipment are the evaporation losses between the gas and liquid interface if the equipment covers are left open. The cover and the closed vent system (a.k.a., vapor recovery system) will reduce emissions significantly.


Emissions from the wastewater system were evaluated with the Permits to Construct issued.

### **RULES EVALUATION:**

#### **PART 1 SCAQMD REGULATIONS**

<b>Rule 212</b>	<b>Standards for Approving Permits</b>	<b>November 14, 1997</b>
	The relocation of the wastewater equipment located at the site of the new ESP for the Rule 1105.1 compliance project and removal of obsolete equipment does not constitute a significant project because (1) the modified permit units are not located within 1000 feet of a school; (2) there is no emission increase; and (3) the modified permit unit does not have an	



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	increased cancer risk greater than, or equal to, one in a million ( $1 \times 10^{-6}$ ) during a lifetime of 70 years or pose a risk of nuisance.
--	--


<b>Rule 401</b>	<b>Visible Emissions</b> <b>November 9, 2001</b>
	Operation of these permit units are not expected to result in visible emissions. The facility is currently in compliance with this rule and is expected to continue to operate in compliance with this rule.

<b>Rule 402</b>	<b>Nuisance</b> <b>May 7, 1976</b>
	Operation of these permit units are not expected to result in public nuisance. The facility is currently in compliance with this rule and is expected to continue to operate in compliance with this rule.


<b>Rule 464</b>	<b>Wastewater Separators</b> <b>December 7, 1990</b>
	This rule applies to the wastewater separators in the wastewater treatment system. The wastewater separators (PPIs and API) are each equipped with a solid cover with all openings sealed, as required. The facility is currently in compliance with this rule and is expected to continue to operate in compliance with this rule.

<b>Rule 1173</b>	<b>Control of VOC Leaks and Releases from Components at Petroleum Facilities and Chemical Plants</b> <b>February 6, 2009</b>
	The miscellaneous fugitive components are subject to Rule 1173 per device condition H23.17. The facility has an approved Inspection and Maintenance (I&M) program for monitoring and repairing fugitive components. All new and existing fugitive components are tagged with Rule 1173 and are monitored according to Ultramar's Rule 1173 leak detection and repair plan. The facility is currently in compliance with this rule and is expected to continue to operate in compliance with this rule.

<b>Rule 1176</b>	<b>Sumps and Wastewater Separators</b> <b>September 13, 1996</b>
	This rule applies to wastewater systems and associated control equipment located at petroleum refineries such as Ultramar. The wastewater treatment system is subject to the requirements of Rule 1176 per System Condition S13.7. The refinery operates a vapor recovery system dedicated to the wastewater treatment system to comply with Rule 1176 requirements.
(d)(2)	Compliance Plan. Ultramar submitted Rule 1176 compliance plan A/N 478120. The District has evaluated the plan application and sent it to EPA for their final approval on June 28, 2013.
(e)(1)	Wastewater System Emissions. This wastewater treatment is expected to continue to meet the 500 ppm limit in Rule 1176. The reconfiguration of certain wastewater equipment due the construction of the new ESP for the FCCU did not increase the wastewater treatment capacity. The oil/water separators, sumps, and sludge tank are all


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<b>Rule 1176</b>	<b>Sumps and Wastewater Separators</b>	<b>September 13, 1996</b>
	tagged with the Rule 1176 emission limit of 500 ppm VOC.	
(e)(2)	Sumps and Wastewater Separators. The wastewater treatment system has 4 sumps: <ul style="list-style-type: none"> <li>95-SMP-1, Diversion Box</li> <li>95-SMP-2, Treated Effluent</li> <li>83-SMP-3, Crude Tank Draw-off</li> <li>83-SMP-2, Oily Water</li> </ul> All the sumps have:	
	n/a	(i) A floating cover equipped with seals.
	✓	(ii) A fixed cover, equipped with a closed vent system vented to an APC device as specified in paragraph (e)(6). Sump 95-SMP-1 is vented to the wastewater treatment system's vapor recovery system. Sumps 95-SMP-2, 83-SMP-3, and 83-SMP-2 are controlled by a water seal to prevent emissions into the atmosphere.
	n/a	(iii) Any other alternate control measure which is demonstrated by the facility operator to be equivalent to, or more effective in reducing VOC emissions than the requirements of clauses (e)(2)(A)(i) or (e)(2)(A)(ii), and approved in writing by the Executive Officer.
	(B) A fixed sump covers shall meet all of the following requirements:	
	✓	(i) The cover material shall be impermeable to VOCs, and free from holes, tears, or openings.
	✓	(ii) Drains on covers shall be provided with a slotted membrane fabric cover, or equivalent, over at least 90 percent of the open area.
	✓	(iii) Gauging or sampling openings on the separator shall be covered. The covers shall be kept closed, with no visible gaps between the cover and the separator, except when the gauging or sampling device is actively being used.
	✓	(iv) Hatches on covers shall be kept closed and free of gaps, except when opened for active inspection, maintenance, sampling, or repair.
	✓	(v) The perimeter of a cover, except for a floating cover, shall form a seal free of gaps with the foundation to which it is attached.
	n/a	(vi) A floating cover shall be designed and maintained so that the gap between the separator or sump wall and the seal does not exceed 1/8 inch for a cumulative length of 97 percent of the perimeter of the separator. No gap between the wall and the seal shall exceed 1/2 inch.
(e)(3)	Sewer Lines. No new sewer lines were installed in this system.	
(e)(4)	Process Drains. No new process drains were installed in this system.	

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<b>Rule 1176</b>	<b>Sumps and Wastewater Separators</b>	<b>September 13, 1996</b>
(e)(5)	Junction Boxes. No new junction boxes were installed in this system.	
(e)(6)	APC Devices. APC Devices shall meet one of the following requirements: <ul style="list-style-type: none"> <li>(A) Achieve a control efficiency of at least 95 percent by weight of VOC. An annual performance test shall be conducted to determine control efficiency,</li> <li>(B) Outlet of the APC device shall not emit VOC emissions greater than 500 ppm above background. The frequency of monitoring shall be at least monthly, or</li> <li>(C) Alternate system that collects vapors through a closed vent system and subsequently controls the vapors in a device, which has been issued a permit to construct or a permit to operate, and determined to provide an equivalent level of VOC emission controls as specified in subparagraphs (e)(6)(A) or (e)(6)(B).</li> </ul> <p>The vapor recovery system for the wastewater system is a closed vent system (A/N 487822, Process 17, System 11) that vents the VOC from the wastewater system to the refinery's vapor recovery system (A/N 421771, Process 17, System 1). This closed vent system was installed to comply with Rule 1176.</p>	
(e)(7)	Additional Requirements for drain system components (DSCs) at Petroleum Refineries. Ultramar complies with the control requirements of this paragraph according to subparagraphs (e)(7)(A): Control of Repeat Emitting DSCs. The refinery is required to inspect, monitor, and maintain the wastewater system, closed vent system, and all DSCs according to the schedule outlined in the Table 2 of the rule. Ultramar submits quarterly reports to the District with the information required in (g)(2)(B).	

<b>REG XIII</b>	<b>New Source Review (NSR)</b>	<b>December 6, 2002</b>
	<b>Application Deem Complete Year: 2008</b>	
	<p>New Source Review requirements apply to new, modified, or relocated sources. For A/N 458073 and 323862, the emissions were calculated in the PC evaluation. Due to Ultramar's personnel difficulties and SCAQMD's internal June 2013 deadline to issue permits to aged applications, Ultramar was not able to provide information for the engineer's additional request by the given deadline. Therefore, the District will convert the PC to PO with the provided information in the PC application. For A/N 323862, there was no emission increase found in the PC evaluation. For A/N 458073, the relocation of some sources within the wastewater system due to the Rule 1105.1 compliance project, the installation of a new sump and removal of an existing sump resulted in an emission increase of 0.045 lbs/day.</p> <p>For A/N 487822, the application was submitted to update the connections from the wastewater system to the correct ejectors within the wastewater system's vapor recovery system. During the refinery's review of their draft initial Title V permit, the refinery discovered many discrepancies with the connections from the wastewater treatment system to the ejectors.</p>	

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<b>REG XIII</b>	<b>New Source Review (NSR)</b>	<b>December 6, 2002</b>
		<b>Application Deem Complete Year: 2008</b>
<b>1303(a): BACT</b>	BACT is not required for the wastewater treatment system and vapor recovery system since the VOC emissions are less than 1 lb/day.	
<b>1303(b):</b>	Only the installation of a new sump and removal of an existing sump resulted in an emission increase in A/N 458073. The net emission increase calculated in the PC was 0.045 lbs/day. Since there is no change from the PC evaluation, the requirements of this paragraph (modeling, offsets, sensitive zone requirements, facility compliance, major polluting facilities) do not apply.	

<b>Rule 1401</b>	<b>New Source Review of Toxic Air Contaminants</b>	<b>May 2, 2003</b>
		<b>Application Deem Complete Year: 2008</b>
	There is no change in emissions from the PC. Therefore, no additional requirements apply.	

<b>Regulation XX</b>	<b>RECLAIM</b>	<b>May 11, 2001</b>
	The wastewater treatment system and associated vapor recovery system is not a source of NOx or SOx emissions.	


<b>Regulation XXX</b>	<b>Title V</b>	<b>March 16, 2001</b>
	Ultramar has been issued a Title V permit effective on May 29, 2009. Therefore, the facility is subject to the requirements of Reg XXX. A/N 458073 was issued a PC on June 21, 2007 and considered an Administrative Permit Revision. A/N 487822 is considered a Minor Permit Revision as defined in Rule 3000 and subject to 45 day review by EPA.	

## PART 2 STATE REGULATIONS

<b>California Environmental Quality Act (CEQA)</b>
The applicant has submitted Form 400-CEQA. This is not a significant project.

## PART 3 FEDERAL REGULATIONS


### Regulation IX: Standards of Performance for New Stationary Sources (NSPS)

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<b>40 CFR Part 60 Subpart GGG</b>	<b>Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries</b>
§60.590	The new sump constructed as part of the Rule 1105.1 compliance plan (A/N 458073) should not trigger NSPS Subpart GGG applicability. The sump does not construct or modify a process unit or compressor, which are the affected facilities regulated under Subpart GGG. The sump does not qualify as a process unit because it does not “produce intermediate or final products from petroleum, unfinished petroleum derivatives, or other intermediates.” [40CFR 60.591]

<b>40 CFR Part 60 Subpart QQQ</b>	<b>Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems</b>
§60.690	Applicability and designation of affected facility. The provisions of this subpart apply to the wastewater system located at the refinery for which construction, modification, or reconstruction commences. Per condition S13.7, the wastewater treatment system is subject to the requirements of Subpart QQQ.
§ 60.698	<p>Reporting requirements. Since the wastewater system consists of oil/water separators, individual drain systems, induced gas floatation units, and other additional support equipment, Ultramar is required to inspect when a water seal is dry or otherwise breached, when a drain cap or plug is missing or improperly installed, or when cracks, gaps, or other problems are identified that resulted in VOC emissions, including information about the repairs or corrective action taken as required under § 60.698. In the refinery’s semi-annual Periodic Monitoring &amp; Exception Report to EPA for the reporting period July 1 through December 31, 2012, Ultramar reported the following:</p> <p><u>Monthly Inspections:</u> There were 2 drains identified with of dry or breached water seals.  <u>Corrective Actions:</u> Added water to two drains to restore water seals.  <u>Semiannual Inspections:</u> There were no components (caps, plugs, covers, etc.) identified with improper seals.</p>


<b>40CFR Part 61 Subpart FF</b>	<b>National Emission Standard for Benzene Waste Operations</b>				
§61.340	<p>Since Ultramar is a petroleum refinery, the facility is subject to the requirements of Subpart FF. Ultramar’s total annual benzene quantity for the year 2010 was reported to EPA as follows:</p> <table border="1"> <tr> <th>Year</th><th>Total Annual Benzene Quantity (Mg/yr)</th></tr> <tr> <td>2010</td><td>42.8</td></tr> </table>	Year	Total Annual Benzene Quantity (Mg/yr)	2010	42.8
Year	Total Annual Benzene Quantity (Mg/yr)				
2010	42.8				
§61.342	To comply with the general standards (§61.342), Subpart FF contains several different options that a facility may use to manage and treat the facility waste if the total annual				

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<b>40CFR Part 61 Subpart FF</b>	<b>National Emission Standard for Benzene Waste Operations</b>				
	<p>benzene quantity from the facility waste is greater than or equal to 10 Mg/yr. The options are:</p> <ul style="list-style-type: none"> <li>61.342(c): waste management and treatment requirements for facilities at which the total annual benzene quantity from the facility waste is equal to or greater than 10 Mg/yr.</li> <li>61.342(d): an alternative to requirements under §61.342(c)</li> <li>61.342(e): an alternative to the requirements under §61.342(c) and (d)</li> <li>61.342(f): off-site treatment option as an alternative to §61.342(c)(1)(i); this option is not available to facilities complying under §61.342(e).</li> </ul> <p>Ultramar elected to comply with the alternative compliance option §61.342(e), which is also known as the 6BQ compliance option. §61.342(e)(2) requires all wastes with a water content of 10% or greater (aqueous waste) to comply with the wastewater provisions in the subsequent paragraphs. In §61.342(e)(2)(i), the sum of all benzene quantity of aqueous waste must be equal to or less than 6.0 Mg/yr. Therefore, the 6BQ compliance option requires Ultramar to manage the benzene quantity for all aqueous waste to less than 6.0 Mg/yr. In checking the Subpart FF annual reports submitted to EPA, we found the benzene quantity for the aqueous waste to be as follows:</p> <table border="1"> <thead> <tr> <th>Year</th><th>Total Annual Benzene Quantity from Aqueous Waste (Mg/yr)</th></tr> </thead> <tbody> <tr> <td>2010</td><td>2.5</td></tr> </tbody> </table> <p>Therefore, Ultramar complies with the general requirements of Subpart FF. The total annual benzene quantification and information required to document compliance with the alternative requirements of §61.342(e) are submitted to EPA annually in accordance with the reporting requirements of §61.357.</p>	Year	Total Annual Benzene Quantity from Aqueous Waste (Mg/yr)	2010	2.5
Year	Total Annual Benzene Quantity from Aqueous Waste (Mg/yr)				
2010	2.5				

#### **Regulation X: National Emission Standards for Hazardous Air Pollutants (NESHAPS)**

<b>40 CFR Part 63 Subpart CC</b>	<b>National Emission Standards for Hazardous Air Pollutant from Petroleum Refineries</b>
§63.640	Applicability and designation of affected source. This subpart pertains to tanks, fugitive equipment leaks, and wastewater systems as well as other emission points.
§63.646	Subpart CC wastewater provisions apply to all wastewater streams and treatment operations associated with refining process units that are a major source of HAPs/ The oil/water separators, sumps, and drain components are tagged with Subpart CC requirements and have been identified as Subpart CC, Group 2 emission points. For these Group 2 emission points, monitoring is required to verify they are Group 2 emission

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<b>40 CFR Part 63 Subpart CC</b>	<b>National Emission Standards for Hazardous Air Pollutant from Petroleum Refineries</b>
	points. Note that the refinery complies with the Group 2 wastewater provisions by complying with 40 CFR 61 Subpart FF [§61.342(c)(2)].

### **CONCLUSION:**

The wastewater treatment system and vapor recovery system for the wastewater treatment system are operating and in compliance with Federal, State, and District rules. It is recommended that Permits to Operate be issued for A/Ns 487822 and 458073. A/N 323862 should be cancelled since this application will be combined with A/N 458073. Revise the Title V permit to add the following permit to operate (Section D).

A/N	Recommendation
487822	Issue Permit to Operate with conditions listed in the Conditions Section
458073	
323862	Cancel application since this application will be combined with A/N 458073

**END of P/O Evaluation**

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